IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

EMG TECHNOLOGY, LLC, 　　　**Plaintiff,** **v.** **THE VANGUARD GROUP, INC.,** 　　　**Defendant.**	**CIV. A. NO. 6:12-cv-543-MHS** **(LEAD CASE)**
EMG TECHNOLOGY, LLC, 　　　**Plaintiff,** **v.** **THE TJX COMPANIES, INC.,** 　　　**Defendant.**	**CIV. A. NO. 6:12-cv-904-MHS** **(CONSOLIDATED CASE)**
EMG TECHNOLOGY, LLC, 　　　**Plaintiff,** **v.** **J.C. PENNEY CORP., INC.,** 　　　**Defendant.**	**CIV. A. NO. 6:12-cv-905-MHS** **(CONSOLIDATED CASE)**
EMG TECHNOLOGY, LLC, 　　　**Plaintiff,** **v.** **COACH, INC.,** 　　　**Defendant.**	**CIV. A. NO. 6:13-cv-029-MHS** **(CONSOLIDATED CASE)**
EMG TECHNOLOGY, LLC, 　　　**Plaintiff,** **v.** **WILLIAMS-SONOMA, INC., et al.,** 　　　**Defendant.**	**CIV. A. NO. 6:13-cv-31-MHS** **(CONSOLIDATED CASE)**

EXHIBIT B
P.R. 4-5(d) JOINT CLAIM CONSTRUCTION CHART

JOINT CLAIM CONSTRUCTION CHART
PURSUANT TO PATENT LOCAL RULE 4-5(d)

CLAIM TERMS[1] (disputed terms in bold)	Claims	EMG's PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
webpage/web page	25, 58	[AGREED]	[AGREED]	"a document on an Internet website"
email form	36, 72	[AGREED]	[AGREED]	Plain meaning
purchasing interface	37, 73	[AGREED]	[AGREED]	"purchasing form displayed in the navigation matrix"
each cell is a division of a screen and **exclusive to a separate single navigation option** associated with a specific unique input	25, 58	No construction necessary.	"there is a one-to-one relationship between cells and navigation options"	
each cell is a division of a screen and exclusive to a separate single navigation option **associated with a specific unique input**	25, 58	"unique input" means "a separate input that actuates only one navigation option" No construction necessary for "associated with a specific unique input"	"associated with a specific unique input" means "associated with a distinct input that actuates only one navigation option"	
displaying a hyperlink on the sister site **to navigate to the web page**	25, 58	No construction necessary.	"to navigate to the web page used to generate the sister site"	
or displaying a hyperlink on the web page **to navigate to the sister site**	25, 58	No construction necessary.	"to navigate to the sister site generated from the web page"	

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[1] As shown in Exhibit A, these terms appear in independent claims 25 and 58 of the patent-in-suit, U.S. Patent No. 7,441,196 (the "'196 Patent") and in certain dependent claims of the '196 Patent.

CLAIM TERMS[1] (disputed terms in bold)	Claims	EMG's PROPOSED CONSTRUCTION	DEFENDANTS' PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
the on-line content **reformatted** from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format to generate a sister site	25, 58	No construction necessary.	"reformatted by a machine transcoder"	
the on-line content reformatted from a webpage in a hypertext markup language (HTML) format into an extensible markup language (XML) format **to generate a sister site**	25, 58	No construction necessary.	"to bring a web site in an XML format into existence by a machine reformatting the HTML format web page"	
displayed in a form of a two-dimensional layer of cells…**the two-dimensional layer in a form of a navigation matrix**	25, 58	No construction necessary.	"the layer is at least two rows and at least two columns and is formed in a rectangular arrangement"	
manipulating a [selected] region of the screen for viewing and zooming and/or scrolling of the displayed on-line content	25, 58	No construction necessary.	"manipulating a cell"	
sister site	25, 58	"a website that is related to another website"	"a site that provides for navigation of a related web page using a simplified navigation interface"	

CLAIM TERMS[2] (disputed terms in bold)	Claims	EMG's PROPOSED CONSTRUCTION	COACH'S PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
simplified navigation interface	25, 58, 35, 36, 71, 72	Plain meaning	"a navigation interface that cannot encompass 'links between pages' or 'prioritization' of content from a web page"	
receiving **a next deeper navigation layer** of the simplified navigation interface	25, 58	Plain meaning	"a more specific navigation layer from the plurality of layers"	

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[2] Only Defendant Coach, Inc. requests construction of these terms.